



to enter the proposed Consent Decree, ECF No. 2-1, and the right to appeal a decision by this Court entering the proposed Consent Decree, and will not seek leave to take discovery or for the Court to hold an evidentiary hearing;

2. Nokia and Pharmacia hereby withdraw and request that the Court strike and remove their Motions from the docket including all exhibits without

prejudice; and

3. Notwithstanding the limitations of Paragraph 1, if the Court authorizes any person other than Nokia or Pharmacia to intervene with a scope that is broader than that set forth in Paragraph 1, Nokia and/or Pharmacia may petition the Court to expand the scope of their intervention, except that Nokia and Pharmacia will not seek to propound discovery on the United States or the Settling Defendants unless they propound discovery on Nokia and/or Pharmacia. The United States and SPG Settling Defendants shall not object to such petition on the grounds of timeliness, but reserve all other rights to object.

Dated: \_\_\_\_\_

**APPROVED AND SO ORDERED**

The Clerk of Court is directed to strike and remove from the docket and the ECF system ECF Nos. 93, 93-1, 93-2, 93-3, 93-4, 94, 94-1, 94-2, 94-3, and 94-4.

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THE HONORABLE MADELINE COX ARLEO,  
U.S.D.J.